

1 Michael Kind, Esq.
2 Nevada Bar No.: 13903
3 **KIND LAW**
4 8860 South Maryland Parkway, Suite 106
5 Las Vegas, Nevada 89123
6 (702) 337-2322
7 (702) 329-5881 (fax)
8 mk@kindlaw.com
Attorney for Plaintiff Borivoj Saric

9
10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 Borivoj Saric,
13 Plaintiff,
14 v.
15 Trans Union, LLC and Kia America
16 Defendants.

16 Case No.: 2:22-cv-01272-CDS-VCF

17
18 **Motion for an extension of time for**
19 **Defendant Experian Information**
20 **Solutions, Inc. to respond to**
21 **Plaintiff's complaint**

22
23 Borivoj Saric (“Plaintiff”), by and through counsel, hereby requests an
24 extension of time for Trans Union, LLC (“Defendant”) to respond to the
25 complaint. Defendant’s responsive pleading was due on September 1, 2022.
26 This is the first request for an extension of this deadline.

27 Pursuant to LR IA 6-1(a), Plaintiff and Defendant failed to request an
28 extension prior to the answer deadline as a result of excusable neglect. Both
29 parties had initially agreed to an extension, but the deadline had passed while
30 settlement discussions were still ongoing. Plaintiff and Defendant are still
31 actively engaged in case-resolution negotiations.

1 In good faith and not for the purposes of delay, Plaintiff submits this
2 motion, on behalf of Defendant, and requests that this Court extend Defendant's
3 deadline to file its responsive pleading until on or before **October 31, 2022**.

4 Dated: September 23, 2022.

5 **KIND LAW**

6 /s/ Michael Kind

7 Michael Kind, Esq.
8 8860 South Maryland Parkway, Suite 106
9 Las Vegas, Nevada 89123
10 *Attorney for Plaintiff Borivoj Saric*

11 IT IS SO ORDERED:

12 

13 _____
14 UNITED STATES MAGISTRATE JUDGE

15 9-26-2022
16 DATED: _____